

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant,

V.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER, AND
MELANIE MONTGOMERY**

Defendants.

Case No. 3:19-cv-02074-G

**PLAINTIFF NATIONAL RIFLE ASSOCIATION OF AMERICA’S RULE 72
OBJECTIONS TO MAGISTRATE’S DISCOVERY ORDER**

Plaintiff the National Rifle Association of America (the “NRA”), pursuant to Fed R. Civ. P. 72(a) and Local Civil Rule 72.1, files these Objections to the Order issued by Magistrate Judge Toliver, dated December 16, 2021 [Doc. No. 430] (the “Order”). For the reasons set forth in the Brief filed contemporaneously herewith, the NRA objects to the Order insofar as it granted Defendants’ motion to compel the deposition of William A. Brewer, III and appointed Honorable Judge Paul D. Stickney to act as Special Master concerning the deposition. The NRA also objects to Order insofar as the NRA’s request for an award of sanctions against the Defendants was denied.

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In accordance with the Local Rules, this Objection is supported by the NRA's Brief filed contemporaneously herewith, which sets forth the NRA's contentions of fact and/or law and argument and authorities. The evidence in support of this Objection is contained in the Appendices filed contemporaneously herewith.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests and prays that the Court grant the following relief:

NRA respectfully requests that this Court sustain its Objections, overrule the portions of Order challenged by the NRA, grant the NRA an award of reasonable expenses and attorney's fees, and grant the NRA all other and further relief to which it may be justly entitled.

Dated: December 30, 2021

Respectfully submitted,

/s/ Philip J. Furia

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ASSOCIATION OF AMERICA**

**PLAINTIFF NATIONAL RIFLE ASSOCIATION OF AMERICA'S
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically served via the Court's electronic case filing system upon all counsel of record on this 30th day of December 2021.

/s/ Philip J. Furia

Philip J. Furia